

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

LEAGUE OF WOMEN VOTERS OF
SOUTH CAROLINA; THE FAMILY
UNIT, INC.; and GEORGE HOPKINS,

Plaintiffs,

v.

MARCI ANDINO, in her official capacity
as the Executive Director of the South
Carolina State Election Commission;
HOWARD M. KNAPP, in his official
capacity as Director of Voter Services of
the South Carolina State Election
Commission; JOHN WELLS, in his official
capacity as Chair of the South Carolina
State Election Commission; and JOANNE
DAY, CLIFFORD J. EDLER, LINDA
MCCALL and SCOTT MOSELEY, in their
official capacities as members of the South
Carolina State Election Commission,

Defendants.

Case No. _____

**PLAINTIFFS' ANSWERS TO LOCAL
RULE 26.01 INTERROGATORIES**

Plaintiffs answer 26.01 Interrogatories as directed by Local Rule 26.01 as follows:

- A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

Answer: None.

- B. As to each claim, state whether it should be tried by jury or nonjury and why.

Answer: Each claim should be tried nonjury because they involve constitutional or legislative questions of law, and plaintiffs seek injunctive and declaratory relief rather than monetary damages.

- C. State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly held corporation owning

ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

Answer: Plaintiffs are not publicly-owned companies, do not have publicly-owned parent companies, and do not own shares of publicly-owned companies.

- D. State the basis for asserting the claim in the division in which it was filed (on the basis of any challenge to the appropriateness of the division).

Answer: The Charleston Division is the appropriate division pursuant to Local Rule 3.01 because the this is where a substantial part of the events or omissions giving rise to the claim occurred, and the South Carolina Election Commission does business relating to the events or omissions alleged in the Charleston Division and throughout the state.

- E. Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether the cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

Answer: This action may be related to *Middleton et. al. v. Andino et. al.*, 3:20-cv-01730, and *Thomas et. al v. Andino et. al*, 3:20-cv-01552, because these cases also challenge provisions of South Carolina's voting laws. However, the present case involves different plaintiffs.

Dated: October 2, 2020

Respectfully submitted,

____s/ Susan K. Dunn
SUSAN K. DUNN (Fed. Bar #647)
SHIRENE C. HANSOTIA (Fed. Bar #12558)
American Civil Liberties Union Foundation of
South Carolina
P.O. Box 20998
Charleston, South Carolina 29413-0998
Telephone: (843) 282-7953
Facsimile: (843) 720-1428
Email: sdunn@aclusc.org
Email: shansotia@aclusc.org

Ezra Rosenberg*
erosenberg@lawyerscommittee.org
John Powers*
jpowers@lawyerscommittee.org
LAWYERS' COMMITTEE FOR CIVIL RIGHTS
UNDER LAW
1500 K Street NW, Suite 900
Washington, DC 20005
Phone: (202) 662-8389
Fax: (202) 783-0857

Catherine Amirfar*
camirfar@debevoise.com
Tara Ganapathy*
tganapathy@debevoise.com
DEBEVOISE & PLIMPTON LLP
919 Third Avenue
New York, NY 10022
(212) 909-6000

**pro hac vice motions forthcoming*

Counsel for Plaintiffs

Julianne J. Marley
jjmarley@debevoise.com
Rhianna Hoover
rhoover@debevoise.com
DEBEVOISE & PLIMPTON LLP
919 Third Avenue
New York, NY 10022
(212) 909-6000

Of Counsel for Plaintiffs